## UNITED STATES DISTRICT COURT NORTHERN DISTRIC OF ILLINOIS EASTERN DIVISION

DARRIN WRIGHT, )	12cv8148
) PLAINTIFF ) )	Judge Robert W. Gettleman Magistrate Arlander Keys
VS.	
CHICAGO POLICE DEPARMENT. et.al)	FILED
DEFENDANTS. )	OCT 1 0 2012
	THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

# PLAINTIFFF'S REQUEST FOR INJUNCTIONS CONSOLIDATED WITH/PLAINTIFF'S MOTION FOR PRODUCTION OF DOCUMENTS

Comes now the Plaintiff Darrin Wright Pursuant to the applicable Federal Rules of Civil Procedure and respectfully request this honorable court for an Emergency Injunction and/or Order in the above entitled case.

Dated this 8th day of October 2012

Darrin Wright
P.O. Box 2903
Chicago, Il 60690

### **FACTS**

On August 1<sup>st</sup> 2012, after a high speed car chase Plaintiff was brutally beaten and tazered by members of the Chicago police department. Plaintiff suffered serious injuries and was arrested. This happened at approximately 6326 s Peoria, in Chicago. An ongoing criminal case exists (#12CR16313). Plaintiff also was deprived of personal property

without due process of laws as a result, of the arrest.

Two agencies are investigating the legalities in these matters, The Chicago Police department (P.O. David Woods 312-745-6310.)#1056705 is investigating the lost of plaintiff's property. The INDEPENDENT POLICE REVIEW, LOG#1056988 (312-746-3609) is investigating the beating of plaintiff.

Inasmuch, as these investigation are underway plaintiff does not know the full scope or parameters of the investigations. Documents crucial in this civil matter MAY not be preserved or may be DESTROYED. Specifically, video from several cameras that were pointing directly where the beating took place EXHIBIT'S A, B, C & D.

The cameras belong to two separate businesses (1) MERCY ENGLEWOOD HOUSING 901 W 63<sup>rd</sup> Street Chicago (a private housing complex): (2) "U.S." BANK 815 W 63<sup>rd</sup> street (The back door of the drive thru/motor branch 859 W 63<sup>rd</sup> street).

Exhibit "A" is southbound picture of the cross section of 63 and Peoria (apprx 20 yards from where the beating occurred) showing the bank. Exhibit "B" is a picture of the back door of the bank (and its camera), facing Westbound directly in front of the spot, where beating occurred.

Exhibit "C" is a Northwest bound picture of the back of the Mercy building, The cameras on the southeast side of the building and were about **20 feet** from the actual spot where the beating occurred. Exhibit "D" is a Westbound picture of the mercy building cameras are about 25 yard from where the beating occurred.

The Constitutional violations and events pictured in the exhibits occurred on August1<sup>st</sup>, 2012, sixty-eight (68) day prior to filing the adjacent **CIVIL RIGHTS COMPLAINT**. Plaintiff being a civilian and a layman has no binding authority to get security tapes from a bank, or to request their preservation. Additionally plaintiff needs a court order to mandate the Englewood housing to produce or preserve tapes.

#### **ARGUMENT**

Plaintiff is at the judicial mercy of this court. Plaintiff is seeking and order for preservation of evidence not a real interested parties in this action. However plaintiff is not on a fishing expedition. Plaintiff has the exact time and dates of the tapes. Plaintiff is

only seeking tapes from august 1<sup>st</sup>, 2012, between 6:45pm-7:45pm and on tape the face 6226 s Peoria. If any tape breach legal cannot be viewed by plaintiff, plaintiff request this honorable court to appoint a neutral party to view the tapes.

Plaintiff also seeks the document from the two agencies that are currently investigating Constitutional Violations against plaintiff including but not limited to:

(1) interview tapes

(2) written and oral statements,

(3) police report

- (4) 911 tapes and/or transcripts
- (5) list of all names of officers present at the beating and chase
- (6) officers present the 5x8 room where the five officers questioned plaintiff
- (7) number and/or identification of the vehicles of police
- (8) video from police vehicles during the chase

#### **CONCLUSION**

Wherefore, Plaintiff requests this honorable court issue the following **ORDERS**, (1) Mercy Englewood housing to preserve give plaintiff the security tapes of the back facing 6326 S Peoria On August 1<sup>st</sup> 6:45pm-7:45pm 2012, (2) "U.S." Bank to give plaintiff the back door of the motor bank On August 1<sup>st</sup> 6:45pm-7:45pm 2012 (3)police officer David Woods and/or the Chicago Police Department to give plaintiff the complete file for log #1056707 (4) Investigator Lakenya White (I.P.R.A.) Log #1056988 to release all tapes, transcripts, interviews pictures names and notes.

Dated this 8th day of October 2012.

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P.O. BOX 2903

CHICAGO, IL 60690